

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

**Civ. No. 11-1126 LFG/ACT**

\$66,665.00 IN UNITED STATES CURRENCY,

*Defendant,*

*and*

WILLIE RAYMOND HALL,

*Claimant.*

**SETTLEMENT AGREEMENT AND RELEASE**

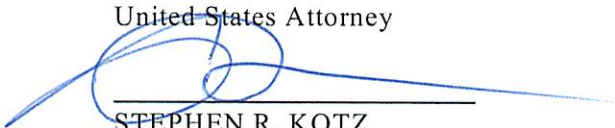
The United States and Claimant Willie Raymond Hall agree as follows:

1. The United States will return \$22,222 of Defendant Currency, less any debt owed to the United States, any agency of the United States, or any other debt which the United States is authorized to collect from Claimant Willie Raymond Hall.
2. All right, title, and interest of Claimant Willie Raymond Hall in the remaining \$44,443 of Defendant Currency will be forfeited to the United States and title thereto vested in the United States.
3. The parties will bear their own costs and attorney's fees in this case.
4. Entry of a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465 is appropriate.
5. The terms of Settlement Agreement and Release constitute full settlement and satisfaction of any and all claims by Claimant Willie Raymond Hall to the Defendant Currency.

6. Claimant Willie Raymond Hall releases and forever discharges the United States, including but not limited to the United States Department of Justice, the U.S. Drug Enforcement Agency (DEA), and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which he has or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Currency.

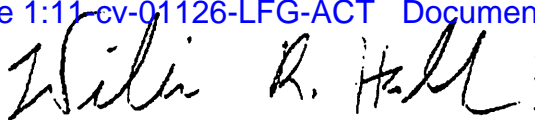
7. Claimant Willie Raymond Hall shall hold harmless the United States, including but not limited to the United States Department of Justice, the DEA, and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which he or any third parties, heirs, successors, agents, subrogees, or assigns, has or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Currency.

KENNETH J. GONZALES  
United States Attorney



STEPHEN R. KOTZ  
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(505) 346-7274

AGREED:



Date

4/13/2012

\_\_\_\_\_  
WILLIE RAYMOND HALL

Claimant

APPROVED:



4/13/2012

GEOFFREY G. NATHAN, ESQ.

Attorney for Claimant Willie Raymond Hall

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